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19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **SAN JOSE DIVISION**

22 GENIUS MEDIA GROUP, INC., THE  
23 NATION COMPANY, L.P., and THE  
24 PROGRESSIVE, INC., individually and on  
25 behalf of all others similarly situated,

26 Plaintiffs,

27 v.

28 ALPHABET INC., GOOGLE LLC, and  
YOUTUBE, LLC,

Defendants.



) Case No. 20-cv-09092-BLF  
)  
) **STIPULATION REGARDING**  
) **DEFENDANTS' DEADLINE TO RESPOND**  
) **TO THE COMPLAINT**

) Hon. Beth Labson Freeman

1 Pursuant to Civil Local Rule 6-1(a), plaintiffs Genius Media Group, Inc., The Nation  
2 Company, L.P., and The Progressive, Inc. (“Plaintiffs”) and defendants Alphabet Inc., Google LLC,  
3 and YouTube, LLC (“Defendants”) stipulate as follows:

4 WHEREAS, Plaintiffs served Defendants with the complaint in the above-captioned matter  
5 on December 18, 2020, and Defendants’ deadline to answer or otherwise respond to the complaint is  
6 January 8, 2021;

7 WHEREAS, Defendants seek an extension of time to answer or otherwise respond to the  
8 complaint in view of the intervening holidays, and the filing and pendency of other related  
9 litigations;

10 WHEREAS, Plaintiffs consent to an extension of the deadline to respond to the Complaint  
11 until January 29, 2021, and Defendants accept such extension, reserving their rights to seek an  
12 additional extension if necessary;

13 WHEREAS, there have been no other requests for extensions of time;

14 WHEREAS, the extension will not alter the date of any event or deadline already fixed by  
15 Court order;

16 NOW THEREFORE, pursuant to Local Rule 6-1(a), the parties through their respective  
17 counsel hereby stipulate as follows:

18 Defendants’ deadline to answer or otherwise respond to the complaint is hereby extended to  
19 January 29, 2021.

20 **IT IS SO STIPULATED.**

21  
22 DATED: January 4, 2021

23 By: /s/ Mark C. Mao  
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13 \* *Pro Hac Vice application pending*

14 **ATTESTATION**

15 I, John E. Schmidlein, am the ECF User whose ID and password are being used to file this  
16 document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in  
17 this filing.

18 /s/ John E. Schmidlein